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6 Attorneys for
7 Petitioner CHASE HOME FINANCE LLC

8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10
11 FRANKI BOLORIN and ROSA RAMOS,

12 Plaintiffs,

13 v.

14 REINER, REINER & BENDETT, P.C.,

15 Defendant.

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18 CHASE HOME FINANCE, LLC, a Delaware
limited liability company

19 Petitioner,

20 v.

21 FRANKI BOLORIN and ROSA RAMOS,

22 Respondents.
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CASE NO.: 07CV2169 JAH (WMC)

**DECLARATION OF S. CHRISTOPHER
YOO IN SUPPORT OF REPLY TO
OPPOSITION TO PETITION OF CHASE
HOME FINANCE LLC TO QUASH
DEPOSITION SUBPOENA DUCES
TECUM**

Date: January 28, 2008
Time: 11:00 a.m.
Ctrom: "C"

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DECLARATION OF S. CHRISTOPHER YOO

I, S. Christopher Yoo, declare as follows:

1. I am a member of the law firm of Adorno Yoss Alvarado & Smith, a Professional Corporation, attorneys of record for Chase Home Finance LLC ("Chase") in the above-captioned action ("Action"). I have been duly admitted to practice law in the State of California, and the Southern District of California. If called as a witness in this Action, I am competent to testify of my own personal knowledge, to the best of my recollection, and as to matters which are public record of which judicial notice may be taken.

2. I submit this Declaration in support of Chase's Reply in response to the opposition to petition to quash deposition subpoena duces tecum ("Opposition") of plaintiffs/respondents Franki Bolorin ("Bolorin") and Rosa Ramos ("Ramos" and collectively, "Plaintiffs" or "Respondents").

3. Respondents previously brought a lawsuit against Reiner, Reiner & Bendett ("Reiner Firm") and David F. Borrino by filing a complaint with the United States District Court, District of Connecticut, Case No. 06-CV-01295-AWT, entitled *Bolorin et al v. Borinno, Reiner, Reiner & Bendett* ("Connecticut Action"). Attached hereto as Exhibit "A" is a true and correct copy of the Pacer Docket Report in connection with the Connecticut Action.

4. Attached hereto as Exhibit "B" is a true and correct copy of the Complaint filed by Respondents in the Connecticut Action. Pursuant to Federal Rules of Evidence §§ 201(b), 201(c), and 201(d), I respectfully request the Court to take judicial notice of the Complaint.

5. Attached hereto as Exhibit "C" is the privilege log produced under Federal Rules of Civil Procedure 45(d)(2). I am told by the Reiner Firm that the substantially same privilege log was produced by the Reiner Firm to Respondents' counsel, Joanne S. Faulkner, Esq., in May 2007.

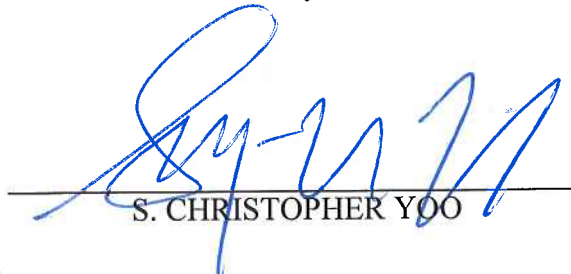
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1 6 I conducted a mapquest.com search to determine the distance between 10790 Rancho
2 Bernardo Road, San Diego, California (Chase's office in San Diego) and 12 Avon Street, New
3 Haven Connecticut (Joanne Faulkner's office in New Haven, Connecticut). According to
4 mapquest.com, the distance between 10790 Rancho Bernardo Road, San Diego, California and 12
5 Avon Street, New Haven Connecticut exceed 2,913 miles.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct, and that this declaration is executed on January 18, 2008 at Santa Ana,
8 California

9
10 
11 S. CHRISTOPHER YOO
12

ADORNO YOSS ALVARADO & SMITH
ATTORNEYS AT LAW
SANTA ANA

EXHIBIT A

DFM, EFILE, MOTREF, REFCNF

U.S. District Court
United States District Court for the District of Connecticut (New Haven)
CIVIL DOCKET FOR CASE #: 3:06-cv-01295-AWT

Bolorin et al v. Borrino et al
Assigned to: Judge Alvin W. Thompson
Referred to: Judge Donna F. Martinez (Settlement)
Cause: 15:1692 Fair Debt Collection Act

Date Filed: 08/18/2006
Jury Demand: Plaintiff
Nature of Suit: 480 Consumer Credit
Jurisdiction: Federal Question

Plaintiff**Franki Bolorin**

represented by **Joanne S. Faulkner**
Law Offices of Joanne Faulkner
123 Avon St.
New Haven, CT 06511-2422
203-772-0395
Email: faulknerlawoffice@snet.net
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff**Rosa Ramos**

represented by **Joanne S. Faulkner**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant**David F. Borrino**

represented by **Charles F. Basil**
Reiner, Reiner & Bendett
160 Farmington Ave.
Farmington, CT 06032
860-255-5005
Fax: 860-677-4549
Email: cbasil@reiner.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Reiner Reiner & Bendett PC

represented by **Charles F. Basil**
 (See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

David Frank Borrino
 (See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Sharon M. Hartley
 (See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
08/18/2006	<u>1</u>	COMPLAINT against David F. Borrino, Reiner Reiner & Bendett PC (Filing fee \$ 350 receipt number N019132), filed by Franki Bolorin, Rosa Ramos.(Pesta, J.) (Entered: 08/21/2006)
08/18/2006	<u>2</u>	Order on Pretrial Deadlines: Motions to Dismiss due on 11/18/06. Amended Pleadings due by 10/17/2006. Discovery due by 2/17/2007. Dispositive Motions due by 3/19/2007. Signed by Clerk on 8/18/06. (Pesta, J.) (Entered: 08/21/2006)
08/18/2006	<u>3</u>	E-FILING ORDER . Signed by Judge Alvin W. Thompson on 8/18/06. (Pesta, J.) (Entered: 08/21/2006)
08/21/2006		Summons Issued as to David F. Borrino, Reiner Reiner & Bendett PC. (Pesta, J.) (Entered: 08/21/2006)
10/05/2006	<u>4</u>	WAIVER OF SERVICE Returned Executed as to David F. Borrino waiver sent on 9/1/2006, answer due 10/31/2006; Reiner Reiner & Bendett PC waiver sent on 9/1/2006, answer due 10/31/2006. filed by Franki Bolorin; Rosa Ramos. (Faulkner, Joanne) (Entered: 10/05/2006)

10/11/2006	<u>5</u>	NOTICE of Appearance by Charles F. Basil on behalf of all defendants (Basil, Charles) (Entered: 10/11/2006)
10/11/2006	<u>6</u>	NOTICE of Appearance by David Frank Borrino on behalf of all defendants (Borrino, David) (Entered: 10/11/2006)
10/11/2006	<u>7</u>	Second NOTICE of Appearance by Charles F. Basil on behalf of all defendants <i>Refiled as "lead" and "notice"</i> (Basil, Charles) (Entered: 10/11/2006)
11/07/2006	<u>8</u>	MOTION for Default Entry 55(a) as to both defendants by Franki Bolorin, Rosa Ramos. (Faulkner, Joanne) (Entered: 11/07/2006)
11/08/2006	<u>9</u>	ANSWER to Complaint by David F. Borrino, Reiner Reiner & Bendett PC.(Basil, Charles) (Entered: 11/08/2006)
11/09/2006	<u>10</u>	ELECTRONIC ORDER: The plaintiff's Request to Clerk to Enter Default (Doc. No. <u>8</u>) as to defendants David F. Borrino and Reiner, Reiner & Bendett, P.C. is hereby GRANTED. A Motion for Default Judgment pursuant to FRCP 55(b) shall be filed by December 11, 2006 or this action will be dismissed by the Clerk pursuant to Rule 41(b) FRCP. It is so ordered. Signed by Judge Alvin W. Thompson on 11/9/06. (Bock, M.) (Entered: 11/09/2006)
11/09/2006	<u>11</u>	ELECTRONIC ORDER: The court's order (Doc. No. <u>10</u>) granting the plaintiff's Request to Clerk to Enter Default (Doc. No. <u>8</u>) as to defendants David F. Borrino and Reiner, Reiner & Bendett, P.C. is hereby VACATED. An Answer (Doc. No. <u>9</u>) was filed by defendants David F. Borrino and Reiner, Reiner & Bendett P.C. on November 8, 2006, prior to the entry of default. Accordingly, the plaintiff's Request to Clerk to Enter Default (Doc. No. <u>8</u>) as to defendants David F. Borrino and Reiner, Reiner & Bendett, P.C. is hereby DENIED. It is so ordered. Signed by Judge Alvin W. Thompson on 11/9/06. (Bock, M.) (Entered: 11/09/2006)
11/21/2006	<u>12</u>	REPORT of Rule 26(f) Planning Meeting. (Faulkner, Joanne) (Entered: 11/21/2006)
11/21/2006	<u>13</u>	Amended REPORT of Rule 26(f) Planning Meeting. (Faulkner, Joanne) (Entered: 11/21/2006)
11/22/2006	<u>14</u>	ELECTRONIC ORDER: The Report of Parties' Planning Meeting (Doc. No. <u>13</u>) is hereby APPROVED. Discovery shall be completed by May 15, 2007. Dispositive motions, if any, shall be filed on or before May 15, 2007. A joint trial memorandum order shall be issued after the dispositive motions deadline has passed. Signed by Judge Alvin W. Thompson on 11/22/06. (Blackburn, M.) (Entered: 11/22/2006)
11/22/2006	<u>15</u>	ELECTRONIC ORDER: In accordance with the parties' request for an early settlement conference in Section V.C.2 of their Report of Rule 26(f) Planning Meeting (Doc. No. <u>13</u>), the case is hereby referred to Magistrate Judge Donna F. Martinez for a settlement conference. It is so ordered. Signed by Judge Alvin W. Thompson on 11/22/06. (Blackburn, M.) (Entered: 11/22/2006)
11/22/2006		Set Deadlines/Hearings: Discovery due by 5/15/2007. Dispositive Motions due by 5/15/2007. (Bauer, J.) (Entered: 11/28/2006)
11/22/2006		CASE REFERRED to Magistrate Judge Donna F. Martinez for a settlement conference. see order <u>15</u> . (Bauer, J.) (Entered: 11/28/2006)

12/01/2006	<u>16</u>	First MOTION for Extension of Time until January 21, 2007 To Respond to First Set of Interrogatories and Requests for Production by David F. Borrino, Reiner Reiner & Bendett PC. (Basil, Charles) (Entered: 12/01/2006)
12/07/2006		Docket Annotation - retransmission of entries for 12/1/06 re <u>16</u> First MOTION for Extension of Time until January 21, 2007 To Respond to First Set of Interrogatories and Requests for Production (Bauer, J.) (Entered: 12/07/2006)
01/18/2007	<u>17</u>	ELECTRONIC ORDER: The defendants' Motion for Enlargement of Time to Respond to Discovery Requests (Doc. No. <u>16</u>) is hereby GRANTED, absent objection, to and including January 21, 2007. It is so ordered. Signed by Judge Alvin W. Thompson on 1/18/07. (Bock, M.) (Entered: 01/18/2007)
02/16/2007	<u>18</u>	A Telephonic Status Conference is scheduled for March 1, 2007 at 11:30 a.m. before Judge Donna F. Martinez. Counsel for the defendants will initiate the conference call to chambers at (860)240-3605 with counsel for all the parties on the line. Signed by Judge Donna F. Martinez on 2/16/07. (Turner, M.) (Entered: 02/16/2007)
02/16/2007		Set Deadlines/Hearings: Telephone Status Conference set for 3/1/2007 11:20 AM before Judge Donna F. Martinez. (Bauer, J.) (Entered: 02/16/2007)
02/20/2007	<u>19</u>	MOTION to Compel by Franki Bolorin, Rosa Ramos.Responses due by 3/13/2007 (Attachments: # <u>1</u> Memorandum in Support # <u>2</u> Affidavit Local Rule 37)(Faulkner, Joanne) (Entered: 02/20/2007)
02/27/2007	<u>20</u>	ELECTRONIC ORDER: The Plaintiffs' Motion to Compel Discovery (Doc. No. <u>19</u>) is hereby REFERRED to Magistrate Judge Donna F. Martinez. It is so ordered. Signed by Judge Alvin W. Thompson on 2/27/07. (Bock, M.) (Entered: 02/27/2007)
03/01/2007	<u>21</u>	NOTICE OF E-FILED ORDER: THIS IS THE ONLY NOTICE THE COURT WILL ISSUE. ALL PERSONS ENTERING THE COURTHOUSE MUST PRESENT PHOTO IDENTIFICATION. The case is scheduled for a Settlement Conference with the undersigned on April 4, 2007 at 2:00 p.m. in Chambers Room 262, 450 Main St., Hartford, CT before Judge Donna F. Martinez. COUNSEL ARE DIRECTED TO THE ATTACHED ORDER FOR FURTHER INSTRUCTIONS. Signed by Judge Donna F. Martinez on 3/1/07. (Wood, R.) (Entered: 03/01/2007)
03/01/2007		Minute Entry for proceedings held before Judge Donna F. Martinez : Telephonic Status Conference held on 3/1/2007. Time 20 minutes (Wood, R.) (Entered: 03/12/2007)
03/29/2007	<u>22</u>	NOTICE by David F. Borrino, Reiner Reiner & Bendett PC of <i>Filing of Confidential Ex Parte Settlement Statement</i> (Basil, Charles) (Entered: 03/29/2007)
04/04/2007	<u>23</u>	Memorandum in Opposition re <u>19</u> MOTION to Compel filed by David F. Borrino, Reiner Reiner & Bendett PC. (Basil, Charles) (Entered: 04/04/2007)
04/04/2007	<u>24</u>	Minute Entry for proceedings held before Judge Donna F. Martinez : Settlement Conference held on 4/4/2007. Case did not settle. Total Time: 2 hours and 30 minutes (Martinez, Donna) (Entered: 04/04/2007)
04/10/2007	<u>25</u>	REPLY to Response to <u>19</u> MOTION to Compel filed by Franki Bolorin, Rosa Ramos. (Faulkner, Joanne) (Entered: 04/10/2007)
04/11/2007	<u>26</u>	REPLY to Response to <u>19</u> MOTION to Compel (<i>Corrected</i>) filed by Franki Bolorin,

		Rosa Ramos. (Faulkner, Joanne) (Entered: 04/11/2007)
04/23/2007	<u>27</u>	ORDER granting in part and denying in part <u>19</u> Motion to Compel. Signed by Judge Donna F. Martinez on 4/23/07. (Turner, M.) (Entered: 04/23/2007)
04/27/2007	<u>28</u>	NOTICE of Appearance by Sharon M. Hartley on behalf of all defendants (Hartley, Sharon) (Entered: 04/27/2007)
05/03/2007	<u>29</u>	MOTION for Protective Order <i>Depositions</i> by Franki Bolorin, Rosa Ramos. Responses due by 5/24/2007 (Attachments: # <u>1</u> Memorandum in Support # <u>2</u> Affidavit)(Faulkner, Joanne) (Entered: 05/03/2007)
05/07/2007	30	ELECTRONIC ORDER: The plaintiffs' Motion for Protective Order (Doc. No. <u>29</u>) is hereby REFERRED to Magistrate Judge Donna F. Martinez. It is so ordered. Signed by Judge Alvin W. Thompson on 5/7/07. (Bock, M.) (Entered: 05/07/2007)
06/01/2007	31	ORDER: The plaintiffs' <u>29</u> Motion for Protective Order is denied without prejudice. The plaintiffs have failed to provide the court with any information as to who is being deposed or the specific questions to which the plaintiffs would object. Signed by Judge Donna F. Martinez on 6/1/07. (Turner, M.) (Entered: 06/01/2007)
06/09/2007	<u>32</u>	Second MOTION to Compel <i>Renewed, re privilege</i> by Franki Bolorin, Rosa Ramos. Responses due by 6/30/2007 (Attachments: # <u>1</u> Exhibit Matters Listing# <u>2</u> Exhibit Privilege Log# <u>3</u> Exhibit Deposition of defendant# <u>4</u> Memorandum in Support # <u>5</u> Affidavit Local Rule 37)(Faulkner, Joanne) (Entered: 06/09/2007)
06/12/2007	33	ELECTRONIC ORDER: The Plaintiffs' Renewed Motion to Compel Discovery (Doc. No. <u>32</u>) is hereby REFERRED to Magistrate Judge Donna F. Martinez. It is so ordered. Signed by Judge Alvin W. Thompson on 6/12/07. (Bock, M.) (Entered: 06/12/2007)
07/11/2007	<u>34</u>	ORDER TO SHOW CAUSE re: Plaintiffs' Renewed Motion to Compel Discovery. Defendants' Show Cause Response due by 7/18/2007. SEE ATTACHED ORDER. Signed by Judge Donna F. Martinez on 7/11/07. (Turner, M.) (Entered: 07/11/2007)
07/11/2007		Set Deadlines/Hearings: Show Cause Response due by 7/18/2007. (Bauer, J.) (Entered: 07/12/2007)
07/18/2007	<u>35</u>	RESPONSE TO <u>34</u> Order to Show Cause by David F. Borrino, Reiner Reiner & Bendett PC. (Basil, Charles) (Entered: 07/18/2007)
08/02/2007	36	ORDER AND CALENDAR: Oral Argument on the plaintiffs' <u>32</u> Motion to Compel is scheduled for oral argument before the undersigned on 8/22/2007 at 10:00 AM in the East Courtroom, 450 Main St., Hartford, CT. ALL PERSONS ENTERING THE COURTHOUSE MUST PRESENT PHOTO IDENTIFICATION. Signed by Judge Donna F. Martinez on 8/2/07. (Turner, M.) (Entered: 08/02/2007)
08/02/2007		Set Deadline as to <u>32</u> Second MOTION to Compel <i>Renewed, re privilege</i> . Motion Hearing set for 8/22/2007 10:00 AM in East Courtroom, 450 Main St., Hartford, CT before Judge Donna F. Martinez. (Pesta, J.) (Entered: 08/03/2007)
08/22/2007	37	Minute Entry. Proceedings held before Judge Donna F. Martinez : taking under advisement <u>32</u> Motion to Compel; Motion Hearing held on 8/22/2007 ; 50 minutes (Court Reporter S. Bowles.) (Pesta, J.) (Entered: 08/22/2007)
09/10/2007		NOTICE OF E-FILED CALENDAR: THIS IS THE ONLY NOTICE COUNSEL

		WILL RECEIVE. ALL PERSONS ENTERING THE COURTHOUSE MUST PRESENT PHOTO IDENTIFICATION. Status Conference set for 9/19/2007 at 02:30 PM, 450 Main Street, Hartford, CT, before James R. Hawkins, ParaJudicial Officer. Counsel please report to the South Chambers, Suite 240, for room assignment. (Smith, S.) (Entered: 09/10/2007)
09/19/2007		NOTICE OF E-FILED CALENDAR: THIS IS THE ONLY NOTICE COUNSEL WILL RECEIVE. ALL PERSONS ENTERING THE COURTHOUSE MUST PRESENT PHOTO IDENTIFICATION. Status Conference set for 9/26/2007 at 11:00 AM, 450 Main Street, Hartford, CT, before James Hawkins, ParaJudicial Officer. Please report to the South Chambers, Suite 240, for room assignment. (Smith, S.) (Entered: 09/19/2007)
09/24/2007	<u>38</u>	MOTION to Continue <i>Status Conference of September 26, 2007</i> by David F. Borrino, Reiner Reiner & Bendett PC. (Basil, Charles) (Entered: 09/24/2007)
09/24/2007	<u>39</u>	Amended MOTION to Continue <i>Status Conference of September 26, 2007 to correct certification</i> by David F. Borrino, Reiner Reiner & Bendett PC. (Basil, Charles) (Entered: 09/24/2007)
09/26/2007	<u>40</u>	Supplemental Memorandum in Support re <u>32</u> Second MOTION to Compel <i>Renewed, re privilege</i> filed by Franki Bolorin, Rosa Ramos. (Faulkner, Joanne) (Entered: 09/26/2007)
09/26/2007	<u>41</u>	ORDER denying as moot <u>38</u> Motion to Continue, in light of the amended motion that was filed (doc. no. 39). Signed by Judge Alvin W. Thompson on 9/26/07. (Smith, S.) (Entered: 09/26/2007)
09/26/2007	<u>42</u>	ORDER: The Amended Motion for Continuance (Doc. No. <u>39</u>) is hereby GRANTED. It is so ordered.Signed by Judge Alvin W. Thompson on 9/26/07. (Smith, S.) (Entered: 09/26/2007)
12/07/2007	<u>43</u>	TRANSCRIPT of Oral Argument held on 8/22/07 before Judge Donna F. Martinez. Court Reporter: S. Bowles. (Pesta, J.) (Entered: 12/07/2007)
12/20/2007	<u>44</u>	Supplemental Memorandum in Support re <u>32</u> Second MOTION to Compel <i>Renewed, re privilege</i> filed by Franki Bolorin, Rosa Ramos. (Faulkner, Joanne) (Entered: 12/20/2007)
12/20/2007	<u>45</u>	ORDER requiring filing of an amended privilege log and submission to chambers of documents in dispute on or before 1/10/08. SEE ATTACHED. Signed by Judge Donna F. Martinez on 12/20/07. (Turner, M.) (Entered: 12/20/2007)

PACER Service Center			
Transaction Receipt			
01/08/2008 16:43:34			
PACER Login:	tc0027	Client Code:	
Description:	Docket Report	Search Criteria:	3:06-cv-01295-AWT
Billable Pages:	5	Cost:	0.40

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FRANKI BOLORIN
ROSA RAMOS

JURY TRIAL DEMANDED

V.

CASE NO. 3:06CV

DAVID F. BORRINO
REINER, REINER & BENDETT, P.C.

COMPLAINT

1. This is an action pursuant to the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. §1692 *et seq.*
2. This Court has jurisdiction. 15 U.S.C. §1692k and 28 U.S.C. §1331.
3. Each Plaintiff is a natural person and a consumer within the FDCPA, who resides in Connecticut.
4. Defendants regularly collect or attempt to collect debts owed or asserted to be owed to another.
5. Each Defendant is a debt collector within the meaning of the Fair Debt Collection Practices Act.
6. Defendant law firm sued plaintiffs on behalf of Deutsche Bank National Trust Company in Hartford Superior Court, seeking a foreclosure on their residential property.
7. Defendant law firm issued a summons, complaint, and lis pendens on September 27, 2005 in Deutsche Bank v. Bolorin and Ramos.
8. The summons, complaint, and lis pendens were served on plaintiffs by a Connecticut State Marshal.

9. The date of service of the legal papers was the law firm's initial communication with plaintiffs.

10. Defendant law firm did not provide the notice mandated by 15 U.S.C. § 1692g.

11. On October 20, 2005, defendant law firm received a letter from plaintiffs dated October 18, 2005, that expressed "serious questions about the amount of the attorney's fees" (\$2,775.40) that had been demanded by Chase, servicer for Deutsche bank.

12. In the October 18, 2005 letter, plaintiffs specifically requested "an itemized statement of those attorney's fees."

13. On October 27, 2005, defendant law firm invoiced Chase for some \$2015.90 in attorney's fees and purported costs.

14. Defendant law firm did not provide an itemized statement to plaintiffs.

15. Instead, defendants aggressively continued the litigation, in violation of 15 U.S.C. § 1692g.

16. As of the date of defendants' next effort to collect the account, December 22, 2005, defendants knew that plaintiffs were paid up to date except for the amount of the disputed law firm invoice or other items which were not recoverable in the foreclosure action.

17. Upon information and belief, defendants prevailed on Chase to stop accepting payments on the account for the purpose of continuing the litigation.

18. Defendants knew plaintiffs were continuing to pay their mortgage account, except for defendants' disputed fees, up to date, yet defendants continued their aggressive pursuit of foreclosure.

19. Defendants demanded a release for themselves as a condition of withdrawing the foreclosure.

20. In the collection efforts, defendants violated the FDCPA, *inter alia*, §1692c, -d, -e, -f, or -g.

WHEREFORE plaintiff respectfully requests this Court to:

1. Award plaintiff such damages as are permitted by law, both compensatory and punitive, including \$1,000 statutory damages for each communication against each defendant, and the attorney's fees incurred in defending against the foreclosure action.
2. Award the plaintiff costs of suit and a reasonable attorney's fee;
3. Award declaratory and injunctive relief and such other and further relief as law or equity may provide.

THE PLAINTIFFS

BY /s/ Joanne S. Faulkner
JOANNE S. FAULKNER ct04137
123 AVON STREET
NEW HAVEN, CT 06511-2422
(203) 772-0395
j.faulkner@snet.net

EXHIBIT C

FRANKIE BOLORIN AND ROSA RAMOS v. DAVID BORRINO
AND REINER, REINER & BENDETT, PC
CASE NO. 3:06cv1295

PRIVILEGE LOG

DATE	TO	FROM	DESCRIPTION
3/29/05	N/A	N/A	Retainer Agreement between Chase Home Finance LLC/JPMorgan Chase Bank, N.A. and Reiner, Reiner & Bendett, P.C. and Schedules 1, 2, and 3 attached thereto
Undated	Jennifer Gray, Chase VP & Asst Gen Counsel, Susan Ramirez, Chase Subprime Litigation Liaison	David Borrino, RRB Atty	Email re results of court hearing and future course of action
Undated	Amy Schrier-Pildis, RRB Paralegal	David Borrino, RRB Atty	Email requesting an extension of time to plead
Undated	Deborah Baker, Chase Asst VP	David Borrino, RRB Atty	Email re settlement conference date and time
9/15/05	Fran Caruso, RRB Paralegal	Chase	Lenstar message with referral of foreclosure
9/27/05	Chase	Karen Wojnarowski, RRB Paralegal	Lenstar message requesting assignment of mortgage
10/7/05	Chase	Lisa Whittemore, RRB Paralegal	Lenstar message with estimated fees and costs
10/20/05	Chase	Lisa Whittemore, RRB Paralegal	Lenstar message providing fees and costs

10/25/05	Lisa Whittemore, RRB Paralegal	Jennifer Santos, Chase Unknown	Lenstar message requesting file put on hold for forbearance and requesting fees and costs
12/8/05	Hasani Tyus Chase Unknown	Lisa Whittemore, RRB Paralegal	Lenstar message re update hold end for forbearance
12/19/05 12/20/05	David Borrino, RRB Atty, Jennifer Allison, RRB Atty, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Hasani Tyus Chase Unknown, Susan Ramirez, Chase Lit Liaison, Ruby Gomez, Chase Legal Liaison	Jennifer Allison, RRB Atty, Kim Blanc, Chase Foreclosure Dept, Ruby Gomez, Chase Legal Liaison	Email chain re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees
12/19/05	David Borrino, RRB Atty, Jennifer Allison, RRB Atty, Hasani Tyus Chase Unknown, Kim Blanc, Chase Foreclosure Dept	Kim Blanc, Chase Foreclosure Dept, Jennifer Allison, RRB Atty	Email chain re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees
12/19/05	David Borrino, RRB Atty, Hasani Tyus Chase Unknown, Kim Blanc, Chase Foreclosure Dept	Jennifer Allison, RRB Atty	Email chain re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees
12/19/05	David Borrino, RRB Atty, Jennifer Allison, RRB Atty, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Hasani Tyus Chase Unknown, Susan Ramirez, Chase Lit Liaison, Ruby Gomez, Chase Legal Liaison	Jennifer Allison, RRB Atty, Kim Blanc, Chase Foreclosure Dept, Ruby Gomez, Chase Legal Liaison	Email chain re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees
12/19/05	David Borrino, RRB Atty, Jennifer Allison, RRB Atty, Hasani Tyus	Kim Blanc, Chase Foreclosure Dept, Jennifer Allison, RRB Atty	Email chain re request for payment history, escrow history, notices and

	Chase Unknown, Kim Blanc, Chase Foreclosure Dept		statements sent to borrower, systems notes, and reinstatement figures, additional fees
12/19/05	David Borrino, RRB Atty, Hasani Tyus Chase Unknown, Kim Blanc, Chase Foreclosure Dept	Jennifer Allison, RRB Atty	Email chain re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees
12/20/05	Chase	Amy Schrier-Pildis, RRB Paralegal	Lenstar message requesting payment history, forbearance agreement, call log and written communications to borrower, and additional fees
1/4/06 12/19/05	David Borrino, RRB Atty, Douglas Williams, Chase Default, Jennifer Allison, RRB Atty, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Hasani Tyus Chase Unknown, Susan Ramirez, Chase Lit Liaison, Ruby Gomez, Chase Legal Liaison	Jennifer Allison, RRB Atty, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Ruby Gomez, Chase Legal Liaison	Email chain re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees
1/4/06 12/19/05	David Borrino, RRB Atty, Douglas Williams, Chase Default, Jennifer Allison, RRB Atty, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Hasani Tyus Chase Unknown, Susan Ramirez, Chase Lit Liaison, Ruby Gomez, Chase Legal Liaison	Jennifer Allison, RRB Atty, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Ruby Gomez, Chase Legal Liaison	Email chain re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees
1/4/06 12/19/05	David Borrino, RRB Atty, Jennifer Allison, RRB Atty, Alexander Loeb,	Jennifer Allison, RRB Atty, Kim Blanc, Chase Foreclosure Dept, Ruby Gomez,	Email chain re request for payment history, escrow history, notices and

	Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Hasani Tyus Chase Unknown, Susan Ramirez, Chase Lit Liaison, Ruby Gomez, Chase Legal Liaison	Chase Legal Liaison	statements sent to borrower, systems notes, and reinstatement figures, additional fees
1/10/06 1/4/06, 12/19/05	David Borrino, RRB Atty, Douglas Williams, Chase Default, Jennifer Allison, RRB Atty, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Hasani Tyus Chase Unknown, Susan Ramirez, Chase Lit Liaison, Ruby Gomez, Chase Legal Liaison	Jennifer Allison, RRB Atty, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Ruby Gomez, Chase Legal Liaison	Email chain re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees
1/17/06	Anna Allard, RRB Paralegal, Randall McHugh, RRB Atty, David Borrino, RRB Atty, Charles Basil, RRB Atty, Barbara Furbish, RRB Paralegal	Barbara Furbish, RRB Paralegal, Anna Allard, RRB Paralegal	Email chain re Fairfield v Ventura, Zaky v McHugh hearing coverage
1/18/06	David Borrino, RRB Atty	Secretha Curry, Chase Unknown	New Trak message re hourly rate approved
1/19/06	Jennifer Allison, RRB Atty, David Borrino, RRB Atty, Douglas Williams, Chase Default	Douglas Williams, Chase Default	Email re information being faxed and no escrow
1/19/06 1/13/06 1/10/06 1/4/06 12/19/05	David Borrino, RRB Atty, Jennifer Allison, RRB Atty, Douglas Williams, Chase Default, Chelsie Cardenas, Chase Loss Mitigation, Chase Loss Mitigation, Ruby Gomez, Chase Legal Liaison, RRB Atty, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Hasani Tyus	Douglas Williams, Chase Default, Chelsie Cardenas, Chase Loss Mitigation, Ruby Gomez, Chase Legal Liaison, Alexander Loeb, Chase DRU Coordinator, Jennifer Allison, RRB Atty, Kim Blanc, Chase Foreclosure Dept	Email chain re payment history, status, repayment plan and requesting documentation (payment history, forbearance agreement, call log, all written communication to and from borrower), Chase contact person, status of court case, attorney's fees with attached court

	Chase Unknown, Susan Ramirez, Chase Lit Liaison		pleadings
1/19/06	David Borrino, RRB Atty	Douglas Williams, Chase Default	Fax cover sheet re email that fax received
1/19/06	Jennifer Allison, RRB Atty, Douglas Williams, Chase Default, David Borrino, RRB Atty	Douglas Williams, Chase Default	Email re faxing information instead of email and no escrow account
1/19/06	Jennifer Allison, RRB Atty, Douglas Williams, Chase Default, David Borrino, RRB Atty	Douglas Williams, Chase Default, Jennifer Allison, RRB Atty	Email chain re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees
1/19/06 1/13/06 1/10/06 1/4/06 12/19/05	David Borrino, RRB Atty, Jennifer Allison, RRB Atty, Douglas Williams, Chase Default, Chelsie Cardenas, Chase Loss Mitigation, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Hasani Tyus Chase Unknown, Susan Ramirez, Chase Lit Liaison, Ruby Gomez, Chase Legal Liaison	Jennifer Allison, RRB Atty, Douglas Williams, Chase Default, Chelsie Cardenas, Chase Loss Mitigation, Ruby Gomez, Chase Legal Liaison, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept	Email chain re payment history and status of account and request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees
1/19/06 1/13/06 1/10/06 1/4/06 12/19/05	David Borrino, RRB Atty, Jennifer Allison, RRB Atty, Douglas Williams, Chase Default, Chelsie Cardenas, Chase Loss Mitigation, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept, Hasani Tyus Chase Unknown, Susan Ramirez, Chase Lit Liaison, Ruby Gomez, Chase Legal Liaison	Jennifer Allison, RRB Atty, Douglas Williams, Chase Default, Chelsie Cardenas, Chase Loss Mitigation, Ruby Gomez, Chase Legal Liaison, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept	Email chain re payment history and status of account and request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees

	Chase Legal Liaison			
1/19/06	David Borrino, RRB Atty, Jennifer Allison, RRB Atty, Douglas Williams, Chase Default	Douglas Williams, Chase Default, Jennifer Allison, RRB Atty	Email chain re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees	
1/19/06 1/13/06 1/10/06 1/4/06 12/19/05	David Borrino, RRB Atty, Jennifer Allison, RRB Atty, Douglas Williams, Chase Default, Chelsie Cardenas, Chase Loss Mitigation, Ruby Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept	Jennifer Allison, RRB Atty, Douglas Williams, Chase Default, Chelsie Cardenas, Chase Loss Mitigation, Ruby Gomez, Chase Legal Liaison, Alexander Loeb, Chase DRU Coordinator, Kim Blanc, Chase Foreclosure Dept	Email chain re payment history and status of account and request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees	
1/19/06	David Borrino, RRB Atty, Douglas Williams, Chase Default	Jennifer Allison, RRB Atty	Email re request for payment history, escrow history, notices and statements sent to borrower, systems notes, and reinstatement figures, additional fees	
2/6/06 1/20/06	Douglas Williams, Chase Default, David Borrino, RRB Atty, Pamela Brown, Chase Loss Mitigation Supervisor	Pamela Brown, Chase Loss Mitigation Supervisor, Douglas Williams, Chase Default	Email chain re request copy of payment history, request for copy of forbearance agreement, request for copy of breach letter	
2/6/06 1/20/06	David Borrino, RRB Atty, Douglas Williams, Chase Default	Douglas Williams, Chase Default, David Borrino, RRB Atty	Email chain attaching documents re forbearance agreement, 30 day breach letter, and payment history	
2/6/06 1/20/06	Pamela Brown, Chase Loss Mitigation Supervisor, David	Douglas Williams, Chase Default, David Borrino, RRB Atty	Email chain re request for forbearance letter, breach letters,	

	Borrino, RRB Atty, Douglas Williams, Chase Default		and payment history
2/7/06	David Borrino, RRB Atty, Douglas Williams, Chase Default, James Catlett, Chase Unknown	Douglas Williams, Chase Default, JoAnn Onishi-Mogg, Chase Client & Servicing Integration	Email chain attaching previous servicer history
2/16/06	Douglas Williams, Chase Default, David Borrino, RRB Atty, Kat Wolfe, Chase (Unknown), Linda Woerz, Chase Program Management, Robert C. Trapp, Chase SubPrime Collections Research	David Borrino, RRB Atty, Douglas Williams, Chase Default, Linda Woerz, Chase Program Management, Robert C. Trapp, Chase SubPrime Collections Research	Email chain requesting copy of 32 day notice, providing status of case, and legal fees requested
2/16/06	David Borrino, RRB Atty, Kat Wolfe, Chase Unknown, Douglas Williams, Chase Default, Linda Woerz, Chase Program Management, Robert Trapp, Chase SubPrime Collections Research	Douglas Williams, Chase Default, Linda Woerz, Chase Program Management, Robert Trapp, Chase SubPrime Collections Research, David Borrino, RRB Atty	Email chain re 32 day delinquency notice
2/16/06	Robert Trapp, Chase SubPrime Collections Research, David Borrino, RRB Atty, Douglas Williams, Chase Default	Douglas Williams, Chase Default, David Borrino, RRB Atty	Email chain re 32 day delinquency notice
2/27/06	Douglas Williams, Chase Default	Holly Tureen, Unknown	Fax cover sheet
2/27/06 2/22/06	David Borrino, RRB Atty, Douglas Williams, Chase Default	Douglas Williams, Chase Default, David Borrino, RRB Atty	Email chain re course of action in case and fees requested and approved
2/27/06	David Borrino, RRB Atty	Douglas Williams, Chase Default	Email re receipt of template
2/27/06 2/22/06	David Borrino, RRB Atty, Douglas Williams, Chase Default	Douglas Williams, Chase Default, David Borrino, RRB Atty	Email chain re template letter sent to homeowner with attached document,

			additional fees approval for motion to strike
2/27/06 2/16/06	Linda Woerz, Chase Program Management, Kat Wolfe, Chase Unknown, David Borrino, RRB Atty, Douglas Williams, Chase Default, Robert Trapp, Chase SubPrime Collections Research	Douglas Williams, Chase Default, Linda Woerz, Chase Program Management, Robert Trapp, Chase SubPrime Collections Research, David Borrino, RRB Atty	Email chain re 32 day delinquency notice
2/27/06 2/22/06	David Borrino, RRB Atty, Douglas Williams, Chase Default	Douglas Williams, Chase Default, David Borrino, RRB Atty	Email chain re additional fees approval for motion to strike
2/28/06	David Borrino, RRB Atty	Douglas Williams, Chase Default	Email re providing copy of check
2/28/06	David Borrino, RRB Atty	Douglas Williams, Chase Default	Email providing date
2/28/06	David Borrino, RRB Atty	Douglas Williams, Chase Default	Email re application of funds
2/28/06	Amy Schrier-Pildis, RRB Paralegal	Douglas Williams, Chase Default	Lenstar message re application of funds
3/1/06	Chase	Amy Schrier-Pildis, RRB Paralegal	Lenstar message re holding funds and sending copy of check
3/7/06	David Borrino, RRB Atty	Douglas Williams, Chase Default	Fax cover sheet re email that fax received
3/7/06 3/2/06	Douglas Williams, Chase Default, Amy Schrier-Pildis, RRB Paralegal	David Borrino, RRB Atty	Email chain re request for breach letter, payment history, reinstatement figures, statements, additional fees, and hearing date and information
3/8/06	David Borrino, RRB Atty	Joanne Faulkner, Atty	Email re short calendar markings and request for discovery responses
3/13/06 3/10/06	David Borrino, RRB Atty, Douglas Williams, Chase Default	Douglas Williams, Chase Default, David Borrino, RRB Atty	Email chain re affidavit and discovery responses w/documents
3/16/06	David Borrino, RRB Atty	Joanne Faulkner, Atty	Email re discovery, withdrawal of foreclosure action

4/4/06	Fran Caruso, RRB Paralegal, Karen Wojnarowski RRB Paralegal, Adam Bendett, RRB Atty, Jennifer Allison, RRB Atty, Amy Hart, Real Estate	David Borrino, RRB Atty, Amy Hart, RRB Real Estate	Email chain re court scheduling for 4/4/06
4/13/06	Charles Basil, RRB Atty	David Borrino, RRB Atty	Email re update on scheduled motion for summary judgment hearing
4/20/06	David Borrino, RRB Atty, Douglas Williams, Chase Default, Eleazar Madrid, Foreclosure Dept, Susan Ramirez, Chase Lit Liaison	Susan Ramirez, Chase Lit Liaison, David Borrino, RRB Atty	Email chain re obtaining copy of collection form letters, 32 day delinquency letters, notice of rights letters, dates letters mailed, point of contact at Chase, and questions regarding notice of default provisions in regard to preparing a motion for summary judgment
4/25/06 4/24/06 4/21/06 4/20/06	Susan Ramirez, Chase Lit Liaison, Jennifer Gray, Chase VP & Asst Gen Counsel, Adam Bendett, RRB Atty, David Borrino, RRB Atty, Kelly Juran, Chase Foreclosure Dept, Douglas Williams, Chase Default, Eleazar Madrid, Foreclosure Dept	David Borrino, RRB Atty, Susan Ramirez, Chase Lit Liaison, Kelly Juran, Chase Foreclosure Dept, Eleazar Madrid, Foreclosure Dept	Email chain re statement of notice of default provisions, options available to Chase to proceed in the matter, copy of notice of rights letters form letter and 32 day delinquency form letter, date letter sent, point of contact at Chase, and questions regarding notice of default provisions in regard to preparing a motion for summary judgment
4/28/06 4/21/06 4/20/06	Douglas Williams, Chase Default Resolution Unit, Susan Ramirez, Chase Lit Liaison David Borrino, RRB Atty	David Borrino, RRB Atty, Douglas Williams, Chase Default Resolution Unit, Susan Ramirez, Chase Lit Liaison	Email chain re handling of account funds, obtaining copy of collection form letters, 32 day delinquency letters, notice of rights letters, dates letters mailed, point of contact at Chase, and questions regarding

			notice of default provisions in regard to preparing a motion for summary judgment
5/8/06	Amy Schrier-Pildis, RRB Paralegal, David Borrino, RRB Atty, Susan Ramirez, Chase Lit Liaison, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, Amy Schrier-Pildis, RRB Paralegal	Email chain re strategy for motion for summary judgment hearing and legal fees
5/8/06	David Borrino, RRB Atty, Susan Ramirez, Chase Lit Liaison, Amy Schrier-Pildis, RRB Paralegal, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, Amy Schrier-Pildis, RRB Paralegal	Email chain advising of hearing on motion for summary judgment and attorney's fees
5/9/06	David Borrino, RRB Atty, Susan Ramirez, Chase Lit Liaison, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re law strategy
5/9/06	David Borrino, RRB Atty, Susan Ramirez, Chase Lit Liaison, David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re law strategy and hearing results
5/10/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain re discussion prior to settlement conference
5/10/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re discussion prior to settlement conference
5/10/06 5/9/06 5/8/06	David Borrino, RRB Atty, Deborah Baker, Chase Asst VP, Jennifer Gray, Chase VP & Asst Gen	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, Deborah Baker, Chase Asst VP	Email chain re availability for settlement conference

	Counsel		
5/10/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re availability for court, and filing plans
5/10/06 5/9/06 5/8/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP	Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP	Email chain re availability for settlement conference
5/11/06 5/10/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain re discussion prior to settlement conference
5/11/06 5/10/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain re discussion prior to settlement conference
5/11/06 5/10/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain re discussion prior to settlement conference
5/11/06 5/10/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain re discussion prior to settlement conference
5/12/06 5/10/06 5/9/06 5/8/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP	Deborah Baker, Chase Asst VP, Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re availability for court dates
5/15/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty	Email chain re update on district court case
5/18/06 5/15/06	Deborah Baker, Chase Asst VP, Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC	David Borrino, RRB Atty, Deborah Baker, Chase Asst VP, Jennifer Gray, Chase VP & Asst Gen Counsel	Email chain re status of case and legal fees

	Atty, Susan Ramirez, Chase Lit Liaison, David Borrino, RRB Atty		
5/18/06 5/15/06	Deborah Baker, Chase Asst VP, Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, Susan Ramirez, Chase Lit Liaison, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	David Borrino, RRB Atty, Deborah Baker, Chase Asst VP, Jennifer Gray, Chase VP & Asst Gen Counsel	Email chain re status of case, settlement conference, and settlement positions
5/18/06 5/15/06	Deborah Baker, Chase Asst VP, David Atkins, ZNC Atty, Susan Ramirez, Chase Lit Liaison, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP, David Borrino, RRB Atty	Email chain re status of case, settlement conference, and settlement positions
5/18/06 5/15/06	Deborah Baker, Chase Asst VP, David Atkins, ZNC Atty, Susan Ramirez, Chase Lit Liaison, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP, David Borrino, RRB Atty	Email chain re status of case, settlement conference, and settlement positions
5/19/06	David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Joanne Faulkner, Atty, David Borrino, RRB Atty	David Borrino, RRB Atty, Joanne Faulker, Atty	Email chain re request of information of Bolorins' atty
5/19/06	David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Joanne Faulkner, Atty, David Borrino, RRB Atty	David Borrino, RRB Atty, Joanne Faulkner, Atty	Email chain re discussion prior to settlement conference
6/4/06 6/2/06	Deborah Baker, Chase Asst VP, David Borrino, RRB Atty, David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re settlement terms, strategy, conference and availability for conference call
6/5/06	Deborah Baker, Chase Asst VP,	Deborah Baker, Chase Asst VP, David	Email chain re settlement conference

6/4/06 6/2/06	David Borrino, RRB Attorney, David Atkins, Zeldes, Needle & Cooper Attorney Jennifer Gray, Chase VP & Asst Gen Counsel	Borrino, RRB Attorney, David Atkins, Zeldes, Needle & Cooper Attorney Jennifer Gray, Chase VP & Asst Gen Counsel	arrangements and conference call arrangements to discuss settlement strategy and parameters
6/5/06 6/4/06 6/2/06	Deborah Baker, Chase Asst VP, David Atkins, ZNC Atty, David Borrino, RRB Attorney, Jennifer Gray, Chase VP & Asst Gen Counsel	Deborah Baker, Chase Asst VP, David Atkins, ZNC Atty, David Borrino, RRB Attorney, Jennifer Gray, Chase VP & Asst Gen Counsel	Email chain re settlement conference arrangements and conference call arrangements to discuss settlement strategy and parameters
6/5/06 6/4/06 6/2/06	Deborah Baker, Chase Asst VP, David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Deborah Baker, Chase Asst VP, David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Email chain re settlement conference arrangements and conference call arrangements to discuss settlement strategy and parameters
6/5/06	Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP, David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Allison, RRB Atty	Amy Schrier-Pildis, RRB Paralegal	Email re availability for conference call
6/5/06 6/4/06 6/2/06	Deborah Baker, Chase Asst VP, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty	Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP, David Borrino, RRB Atty	Email chain re settlement terms, strategy, conference and availability for conference call
6/5/06 6/4/06 6/2/06	Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP, David Borrino, RRB Atty, David Atkins, ZNC Atty	David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP, David Borrino, RRB Atty	Email chain re settlement terms, strategy, conference and availability for conference call
6/5/06 6/4/06 6/2/06	Deborah Baker, Chase Asst VP, David Borrino, RRB Atty, David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP, David Borrino, RRB Atty	Email chain re settlement terms, strategy, conference and availability for conference call

6/5/06 6/4/06 6/2/06	Deborah Baker, Chase Asst VP, David Borrino, RRB Atty, David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP, David Borrino, RRB Atty	Email chain re settlement terms, strategy, conference and availability for conference call
6/5/06 6/4/06 6/2/06	David Borrino, RRB Atty, David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Deborah Baker, Chase Asst VP	Deborah Baker, Chase Asst VP, Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re settlement terms, strategy, conference and availability for conference call
6/21/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	David Atkins, ZNC Atty	Email attaching settlement proposal
6/21/06 6/15/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty, Joanne Faulkner, Atty	David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Joanne Faulkner, Atty	Email chain re settlement terms
6/21/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty, Deborah Baker, Chase Asst VP	Deborah Baker, Chase Asst VP, Jennifer Gray, Chase VP & Asst Gen Counsel	Email chain re settlement terms
6/21/06	David Borrino, RRB Atty, David Atkins, ZNC Atty, Deborah Baker, Chase Asst VP	Jennifer Gray, Chase VP & Asst Gen Counsel	Email re settlement terms
6/21/06 6/6/06	David Borrino, RRB Atty, David Atkins, ZNC Atty	David Atkins, ZNC Atty, David Borrino, RRB Atty, Joanne Faulkner, Atty	Email chain re settlement terms
6/21/06 6/15/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty	David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re settlement terms
7/7/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, Deborah Baker, Chase Asst	David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re release terms and settlement provisions with attached release

	VP, David Atkins, ZNC Atty			
7/10/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty, Joanne Faulkner, Atty	David Atkins, ZNC Atty, Joanne Faulkner, Atty, Heather Pucillo, Unknown	Email chain re settlement terms and release with attached letter	
7/10/06	Joanne Faulkner, Atty	David Atkins, ZNC Atty, Heather Pucillo, Unknown	Email chain re settlement terms and release with attached letter	
7/11/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty	David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re settlement terms	
7/11/06	David Borrino, RRB Atty	David Atkins, ZNC Atty	Email re Deborah Baker affidavit review	
7/11/06 7/10/06	David Borrino, RRB Atty, David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Joanne Faulkner, Atty	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, Joanne Faulkner, Atty, Heather Pucillo, Unknown	Email chain re settlement terms and release with attached letter	
7/11/06 6/30/06	David Borrino, RRB Atty, David Atkins, ZNC Atty, Amy Schrier-Pildis, RRB Paralegal, Jennifer Allison, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re notice of rights letter; draft motion for summary judgment, special defenses, discovery letter and responses, affidavits for review before filing	
7/11/06 6/30/06	David Borrino, RRB Atty, David Atkins, ZNC Atty, Amy Schrier-Pildis, RRB Paralegal, Jennifer Allison, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re notice of rights letter; draft motion for summary judgment, special defenses, discovery letter and responses, affidavits for review before filing	
7/11/06 7/10/06	David Borrino, RRB Atty, David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Joanne Faulkner, Atty	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, Joanne Faulkner, Atty, Heather Pucillo, Unknown	Email chain re settlement terms and release with attached letter	

7/12/06	David Borrino, RRB Atty, David Atkins, ZNC Atty	Jennifer Gray, Chase VP & Asst Gen Counsel	Email re results of court conference
7/12/06 7/11/06 6/30/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, Amy Schrier-Pildis, RRB Paralegal, Jennifer Allison, RRB Atty	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re notice of rights letter; draft motion for summary judgment, special defenses, discovery letter and responses, affidavits for review before filing
7/13/06 7/12/06	David Borrino, RRB Atty, David Atkins, ZNC Atty, Amy Schrier-Pildis, RRB Paralegal, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re results of court conference and ordering transcript
7/18/06 7/13/06 7/12/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Amy Schrier-Pildis, RRB Paralegal, David Atkins, ZNC Atty	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	Email chain re results of court conference, settlement, and ordering transcript
7/20/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	David Atkins, ZNC Atty	Email attaching proposed release
7/21/06 7/20/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty	Email chain attaching proposed release and discussion settlement agreement
7/28/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino	David Atkins, ZNC Atty	Email re release and settlement provisions
7/29/06	David Borrino, RRB Atty	David Atkins, ZNC Atty	Email re attorney's fees
7/29/06 7/28/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty	David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain re release and settlement provisions
7/30/06 7/29/06	David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen	David Borrino, RRB Atty, David Atkins, ZNC Atty	Email chain re attorney's fees

	Counsel, David Borrino, RRB Atty		
7/31/06	David Borrino, RRB Atty, David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain re attorney's fees
7/30/06			
7/29/06			
8/7/06	David Borrino, RRB Atty, David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain re settlement agreement and release terms and provisions
8/7/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	David Atkins, ZNC Atty	Email re settlement agreement and release terms and provisions
8/10/06	David Borrino, RRB Atty, David Atkins, ZNC Atty	David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain re settlement and release of lis pendens
8/10/06	David Borrino, RRB Atty	David Atkins, ZNC Atty	Email re release of lis pendens
8/11/06	David Borrino, RRB Atty, David Atkins, ZNC Atty	David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain re settlement and release of lis pendens
8/10/06			
8/14/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Cindy Gregory, ZNC Unknown, David Atkins, ZNC Atty	Email attaching settlement agreement and release for review
8/14/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Susan Ramirez, Chase Lit Liaison, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty	Email chain re settlement agreement and release terms and provisions
8/14/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Susan Ramirez, Chase Lit Liaison, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty	Email chain re settlement agreement and release terms and provisions
8/14/06			
8/15/06	Cindy Gregory, ZNC Unknown, David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray,	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, Cindy Gregory, ZNC Unknown	Email chain re settlement agreement and release
8/14/06			

	Chase VP & Asst Gen Counsel		
8/15/06 8/14/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Cindy Gregory, ZNC Unknown, David Atkins, ZNC Atty	David Atkins, ZNC Atty, David Borrino, RRB Atty, Cindy Gregory, ZNC Unknown	Email chain re settlement agreement and release
8/16/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, Joanne Faulkner, Atty	David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re settlement agreement and release revisions and terms
8/21/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty	David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Email chain re settlement agreement and release revisions and terms
8/21/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty	David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Gen Asst Counsel	Email chain re settlement agreement and release revisions and terms
8/21/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, Anne Voos, ZNC Unknown	Email chain regarding filing of documents with attached documents
8/21/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty	Email chain re settlement agreement and release revisions and terms
8/21/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Anne Voos, ZNC Unknown	Email attaching document plaintiffs filings
8/21/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	David Atkins, ZNC Atty	Email re settlement agreement and release revisions and terms
8/22/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty,	David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re settlement agreement and release revisions and terms

	Joanne Faulkner, Atty		
8/22/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty, Joanne Faulkner, Atty	David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, Joanne Faulkner, Atty	Email chain re settlement agreement and release revisions and terms, proceeding with foreclosure and federal action
8/22/06	David Borrino, RRB Atty, David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Joanne Faulkner, Atty	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re settlement agreement and release revisions and terms, proceeding with foreclosure and federal action
8/22/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Joanne Faulkner, Atty	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re settlement agreement and release revisions and terms, proceeding with foreclosure and federal action
8/22/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Joanne Faulkner, Atty	David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re settlement agreement and release revisions and terms, proceeding with foreclosure and federal action
8/22/06 8/21/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty	Email chain re oral agreement, release
8/22/06 8/21/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty	Email chain re settlement agreement and release revisions and terms
8/23/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty, Joanne Faulkner, Atty	David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re borrower's atty message to print settlement agreement and execute and mailed to atty overnight, agreement signatures, agreement revisions with agreement attached

8/23/06	Joanne Faulkner, Atty, David Atkins, ZNC Atty	David Atkins, ZNC Atty, Joanne Faulker, Atty	Email chain re settlement agreement and release revisions and terms
8/22/06	David Atkins, ZNC Atty, David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Joanne Faulkner, Atty	Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re settlement agreement and release revisions and terms
8/23/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty	David Atkins, ZNC Atty	Email attaching Plaintiffs' Filings
8/23/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty, Joanne Faulkner, Atty	David Atkins, ZNC Atty, Joanne Faulkner, Atty	Email chain re settlement agreement and release revisions and terms
8/27/06	David Borrino, RRB Atty, Amy Schrier-Pildis, RRB Paralegal	Lisa Whittemore, RRB Paralegal	Email requesting file and that it will be closed
8/28/06	David Borrino, RRB Atty, Monica Melchionni, RRB Law Clerk	Monica Melchionni, RRB Law Clerk, David Borrino, RRB Atty	Email chain re statutes in regard to canceling endorsement on note
8/29/06	Jennifer Gray, Chase VP & Asst Gen Counsel, David Borrino, RRB Atty, David Atkins, ZNC Atty	David Atkins, ZNC Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, Joanne Faulkner, Atty	Email chain re district court action stipulation of dismissal with copy of electronic notice of filing, requesting copy of settlement agreement, withdrawal of matter sent to borrower's atty, recording of release of lis pendens, credit report clearing, check delivered to borrower's atty, intention to file with court the stipulation of dismissal
9/5/06	Amy Schrier-Pildis, RRB Paralegal, David Borrino, RRB Atty, Elizabeth Smith, Chase Foreclosure	Elizabeth Smith, Chase Foreclosure Supervisor, Amy Schrier-Pildis, RRB Paralegal	Email chain re additional fees requested and approval

	Supervisor		
9/6/06	David Borrino, RRB Atty, Jennifer Gray, Chase VP & Asst Gen Counsel, David Atkins, ZNC Atty	David Atkins, ZNC Atty, David Borrino, RRB Atty	Email chain sending copy of recorded release of lis pendens